



**SCOPELITIS, GARVIN, LIGHT, HANSON & FEARY**  
ATTORNEYS AT LAW

INDIANAPOLIS  
CHICAGO • WASHINGTON, D.C. • LOS ANGELES • KANSAS CITY • CHATTANOOGA • DETROIT

1850 M Street, N W, Suite 280 Washington, D.C. 20036-5804  
phone (202) 783-9222 fax (202) 783-9230  
www.scopelitis.com



226614

March 13, 2010

**BY FEDEX EXPRESS**

Ms. Cynthia T. Brown  
Chief, Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E Street, S.W., Room 1034  
Washington, DC 20423-0001

ENTERED  
Office of Proceedings

MAR 16 2010

Part of  
Public Record

Re: Peter Pan Bus Lines, Inc.--Pooling--Greyhound Lines, Inc.,  
STB Docket No. MC-F-20908

Dear Ms. Brown:

On March 12, 2010, I filed electronically with the Surface Transportation Board on behalf of Greyhound Lines, Inc., a letter to you, with certificate of service and enclosures, in the above-referenced docket. Because the electronic version of the letter and certificate did not contain manual signatures, I am attaching manually-signed signature pages of both documents.

Respectfully,

Daniel R. Barney  
Counsel to Greyhound Lines, Inc.

Enclosures

cc: Jeremy Kahn, Esq., Counsel to Peter Pan Bus Lines, Inc.

Ms. Cynthia T. Brown  
March 12, 2010  
Page 2

approved in MC-F-20908 (enclosed as Exhibit E). "Pooled Routes" is currently defined in that pooling agreement (at 2) as, among others, "route 126 on the attached Greyhound map, Attachment 2." The Greyhound map and timetables in the referenced Attachment 2 already show Washington, DC-Philadelphia, PA-via-Baltimore, MD as a route that connects with Schedule/Route 126 (namely, Schedule/Route 122). The Fifth Amendment would clarify the definition of "Pooled Routes" to make this reference to Route 122 express. It should be noted that Baltimore already constitutes a point served under the pooling agreement by virtue of its inclusion in Trailways Schedule/Route 7056 (see Exhibit E, p. 2 and Attachment 1), and Philadelphia already constitutes a point served under the parties' existing New York, NY-Philadelphia, PA pooling agreement approved in MC-F-20904.

Because the proposed Fifth Amendment is a minor, ministerial rewording, Greyhound and Peter Pan believe that, like the Fourth Amendment, it comes within the scope of the Board's earlier pooling approvals and, hence, requires no action by the Board. If you agree, we would greatly appreciate your sending us a letter stating that no action by the Board is needed. If you believe instead that a formal pooling application is required, please advise me as soon as possible and the parties will prepare and submit such an application.

If Greyhound and Peter Pan are to begin offering the new Washington, DC-Philadelphia BoltBus service on April 1, 2010, in time to provide passengers a competitive alternative to the planned new Megabus service on that route that will start on March 21, 2010, they will need to start advertising and selling tickets online for the new route by March 25, 2010, a week before starting service. For this reason, it would be very helpful if you could respond to this letter by March 24, 2010. If you have any questions concerning this letter, which Peter Pan has approved, please feel free to contact me. Thank you.

Respectfully,



Daniel R. Barney  
Counsel to Greyhound Lines, Inc.

Enclosures

cc: Jeremy Kahn, Esq., Counsel to Peter Pan Bus Lines, Inc.

**BEFORE THE  
SURFACE TRANSPORTATION BOARD**

---

Finance Docket Nos. MC-F-20908, MC-F-20904, MC-F-20912

---

**PETER PAN BUS LINES, INC.-POOLING-GREYHOUND LINES, INC.**

**CERTIFICATE OF SERVICE**

I certify that I have this 12th day of March 2010 served copies of the foregoing letter and exhibits to Ms. Cynthia T. Brown, Chief, Section of Administration, Office of Proceedings, Surface Transportation Board, dated March 12, 2012, on the only other party of record in these proceedings, Peter Pan Bus Lines, Inc., by email to its counsel:

Jeremy Kahn, Esq.  
Kahn and Kahn, Attorneys at Law  
1730 Rhode Island Ave., N.W. Suite 810  
Washington, DC 20036  
[jkahn@erols.com](mailto:jkahn@erols.com)



---

Daniel R. Barney  
Counsel for Greyhound Lines, Inc.